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UNITED STATES DISTRICT COURT
NORTHERN DISTRICT OF CALIFORNIA
SAN FRANCISCO DIVISION

UNITED STATES OF AMERICA,)	NO. CR 16-00227 SI
)	
Plaintiff,)	STIPULATION TO EXCLUDE TIME FROM
)	AUGUST 15, 2022 TO SEPTEMBER 27, 2022 AND
v.)	[PROPOSED] ORDER
)	
BTC-E, A/K/A CANTON BUSINESS)	
CORPORATION,)	
)	
and)	
)	
ALEXANDER VINNIK,)	
)	
Defendants.)	
)	

It is hereby stipulated by and between counsel for the United States and counsel for the defendant Alexander Vinnik that time be excluded under the Speedy Trial Act from August 15, 2022, through September 27, 2022.

At the status conference held on August 15, 2022, the government and counsel for the defendant

1 agreed that time be excluded under the Speedy Trial Act so that defense counsel could continue to
 2 prepare, including by reviewing discovery. For this reason and as further stated on the record at the
 3 status conference, the parties stipulate and agree that excluding time until September 27, 2022, will
 4 allow for the effective preparation of counsel. *See* 18 U.S.C. § 3161(h)(7)(B)(iv). The parties further
 5 stipulate and agree that the ends of justice served by excluding the time from August 15, 2022, through
 6 September 27, 2022, from computation under the Speedy Trial Act outweigh the best interests of the
 7 public and the defendant in a speedy trial. 18 U.S.C. § 3161(h)(7)(A), (B)(iv).

8 The undersigned Assistant United States Attorney certifies that she has obtained approval from
 9 counsel for the defendant to file this stipulation and proposed order.

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 11 IT IS SO STIPULATED.

12 DATED: August 22, 2022

 /s/
 CLAUDIA QUIROZ
 Assistant United States Attorney
 C. ALDEN PELKER
 Trial Attorney, CCIPS

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 16 DATED: August 22, 2022

 /s/
 DAVID RIZK
 Counsel for Defendant Alexander Vinnik

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 18 **[PROPOSED] ORDER**

19 Based upon the facts set forth in the stipulation of the parties and the representations made to the
 20 Court on August 15, 2022, and for good cause shown, the Court finds that failing to exclude the time
 21 from August 15, 2022, through September 27, 2022, would unreasonably deny defense counsel and the
 22 defendant the reasonable time necessary for effective preparation, taking into account the exercise of
 23 due diligence. 18 U.S.C. § 3161(h)(7)(B)(iv). The Court further finds that the ends of justice served by
 24 excluding the time from August 15, 2022, to September 27, 2022, from computation under the Speedy
 25 Trial Act outweigh the best interests of the public and the defendant in a speedy trial. Therefore, and
 26 with the consent of the parties, IT IS HEREBY ORDERED that the time from August 15, 2022, through
 27 September 27, 2022, shall be excluded from computation under the Speedy Trial Act. 18 U.S.C. §
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1 3161(h)(7)(A), (B)(iv).

2 IT IS SO ORDERED.

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4 DATED: _____

5 HON. SUSAN ILLSTON
6 United States District Judge
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